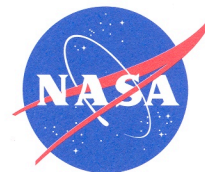


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



January 18, 2012

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Lawyer Symposium Sponsored by Dombroff Gilmore Jacques and French, P.C. Breakfast on January 19, 2012

On January 19, 2011, Dombroff Gilmore Jacques and French, P.C. will sponsor a breakfast in the Ritz Carlton Hotel, in Washington, D.C., from 9 AM – 9:30 AM. The purpose of this event is to educate the aviation industry on emergency response issues and procedures.

The breakfast will include a speech by NASA Administrator Charles Bolden, and Q&A. Approximately 250 people have been invited to attend, including NASA personnel, academia, the media, and representatives of the aerospace industry. The estimated cost of the breakfast, including all food and beverages, is \$22 per person. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

Accordingly, NASA employees whose duties do not substantially affect the sponsors – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

However, NASA employees whose duties may substantially affect the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone